



"I will stand for my client's rights.  
I am a trial lawyer."  
—Ron Motley (1944–2013)

28 Bridgeside Blvd.  
Mt. Pleasant, SC 29464  
o. 843.216.9000 f. 843.216.9450

**Robert T. Haefele**  
*Licensed in DC, NJ, NY, PA, SC*  
direct: 843.216.9184  
rhaefele@motleyrice.com

**Via ECF**

January 3, 2019

The Honorable George B. Daniels  
United States District Court  
Southern District of New York  
Daniel P. Moynihan U.S. Courthouse  
500 Pearl Street  
New York, NY 10007

The Honorable Sarah Netburn  
U.S. Magistrate Judge  
United States District Court  
Southern District of New York  
Thurgood Marshall U.S. Courthouse  
40 Foley Square  
New York, NY 10007

**Re: In re Terrorist Attacks on September 11, 2001  
Dkt. No. 03-md-1570**

Dear Judge Daniels and Magistrate Judge Netburn:

As required by the Court's July 10, 2018 Amended Order Approving Notice to Conform, Short Form Complaints, and Notices of Amendment (ECF No. 4045), we submit this letter on behalf of the plaintiffs in the following cases, who have filed Short Form Complaints against the Islamic Republic of Iran, and write to request that the actions be made a part of this multi-district litigation (03-md-1570):

- *Arias, et al., v. Islamic Republic of Iran*, civil action no. 19-cv-41;
- *Prior, et al., v. Islamic Republic of Iran*, civil action no. 19-cv-44;

We have also filed Related Case Statements on the civil docket as to each case, explaining that the newly filed cases are each related to the multidistrict litigation captioned as *In re Terrorist Attacks on September 11, 2001*, 03-md-1570 (GBD)(SN) ("MDL 1570").

Respectfully,

MOTLEY RICE LLC

By: /s/ Robert T. Haefele  
ROBERT T. HAEFELE

cc: All Counsel of Record via ECF